



July 28, 2023

VIA ECF

Hon. Jed S. Rakoff
United States District Court
Southern District of New York
500 Pearl St., Courtroom 14B
New York, NY 10007

Re: Freeman v. Amazon.com Inc., et al., Case No. 1:23-cv-04796-JSR

Dear Judge Rakoff:

Defendants Amazon.com Inc., Target Brands Inc., and Walmart Inc. write jointly with Plaintiff Lynne Freeman pursuant to Your Honor's Notice of Court Conference (the "Notice") (ECF No. 39) to respectfully request an adjournment of the parties' Initial Pre-Trial Conference currently scheduled for August 11, 2023 and all other deadlines and requirements contained in the Notice.

On June 15, 2023, the parties filed a Stipulation and Proposed Order (ECF No. 31) agreeing to stay this action pending final resolution of Related Case captioned *Freeman v. Tracy Deebs-Elkenaney et al.*, No. 22-cv02435-LLS-SN, which has not yet been ruled on. The parties believe it would be the most efficient use of resources to adjourn the Initial Pre-Trial Conference and suspend all dates and requirements included in the Notice pending the Court's ruling on the Stipulation and Proposed Order. The parties have not previously requested an adjournment of this date.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Benjamin S. Halperin
Benjamin S. Halperin

Cc: All Counsel of Record (via ECF)